

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

DOC NO  
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2015 DEC 17 PM 1:30

UNITED STATES OF AMERICA

PETER OPPENEER  
CLERK U.S. DIST. COURT  
WD OF WI  
SUPERSEDING INDICTMENT

v.

MONTA GROCE,

Defendant.

Case No. 15-cr-78-wmc  
18 U.S.C. § 1591(a)(1) & (b)(1)  
18 U.S.C. § 371  
18 U.S.C. §§ 2421 & 2  
21 U.S.C. § 856(a)(1)  
18 U.S.C. § 924(c)(1)(A)  
18 U.S.C. § 1594(a)  
18 U.S.C. § 1513(b)(2)

THE GRAND JURY CHARGES:

COUNT 1

Between in or about December 2012, to in or about January 2013, in the Western District of Wisconsin and elsewhere, the defendant,

MONTA GROCE,

knowingly recruited, enticed, harbored, transported, and maintained by any means "Jane Doe 1," in and affecting interstate commerce, knowing, and in reckless disregard of the fact, that force, threats of force, coercion, and any combination of such means, would be used to cause "Jane Doe 1" to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1)).

COUNT 2

Between in or about January 2013, to in or about April 2013, in the Western District of Wisconsin and elsewhere, the defendant,

MONTA GROCE,

knowingly recruited, enticed, harbored, transported, and maintained by any means "Jane Doe 2," in and affecting interstate commerce, knowing, and in reckless disregard of the fact, that force, threats of force, coercion, and any combination of such means, would be used to cause "Jane Doe 2" to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1)).

COUNT 3

Between in or about January 2013, to in or about March 2013, in the Western District of Wisconsin and elsewhere, the defendant,

MONTA GROCE,

knowingly recruited, enticed, harbored, transported, and maintained by any means "Jane Doe 3," in and affecting interstate commerce, knowing, and in reckless disregard of the fact, that force, threats of force, coercion, and any combination of such means, would be used to cause "Jane Doe 3" to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1)).

COUNT 4

1. Between in or about December 2012, to in or about April 2013, in the Western District of Wisconsin and elsewhere, the defendant,

MONTA GROCE,

knowingly conspired and agreed with C.N., R.C., B.T., and others unknown to the grand jury, to violate Title 18, United States Code, Section 2421, by transporting and causing to be transported female individuals, including but not limited to "Jane Doe 1," "Jane Doe 2," and "Jane Doe 3," in interstate commerce, with intent that the female

individuals engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense.

2. It was part of the conspiracy that the defendant paid C.N., R.C., and B.T. cash and heroin to drive the female individuals, including but not limited to "Jane Doe 1," "Jane Doe 2," and "Jane Doe 3," from Wisconsin to Minnesota.

3. It was further part of the conspiracy that C.N., R.C., and B.T., at the direction of the defendant, drove the female individuals, including but not limited to "Jane Doe 1," "Jane Doe 2," and "Jane Doe 3," from Wisconsin to Minnesota.

4. It was further part of the conspiracy that the defendant intended for the female individuals, including but not limited to "Jane Doe 1," "Jane Doe 2," and "Jane Doe 3," to engage in prostitution in Minnesota.

5. It was further part of the conspiracy that the female individuals, including but not limited to "Jane Doe 1," "Jane Doe 2," and "Jane Doe 3," engaged in prostitution in Minnesota and the defendant benefitted financially from these acts of prostitution.

#### OVERT ACTS

6. In furtherance of the conspiracy and to effect its objectives, the following over acts, among others, were committed in the Western District of Wisconsin and elsewhere:

(a) On or about January 13, 2013, the defendant paid C.N. to drive "Jane Doe 1" from Wisconsin to Minnesota for the purpose of "Jane Doe 1" engaging in prostitution in Minnesota.

(b) On or about January 13, 2013, C.N. drove "Jane Doe 1" from Wisconsin to Minnesota for the purposes of "Jane Doe 1" engaging in prostitution in Minnesota.

(In violation of Title 18, United States Code, Section 371).

COUNT 5

On or about January 13, 2013, in the Western District of Wisconsin and elsewhere, the defendant,

MONTA GROCE,

knowingly transported and caused to be transported an individual, that is, "Jane Doe 1," in interstate commerce, from Wisconsin to Minnesota, with intent that "Jane Doe 1" engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense.

(In violation of Title 18, United States Code, Sections 2421 and 2).

COUNT 6

Between in or about December 2012, to in or about April 2013, in the Western District of Wisconsin, the defendant,

MONTA GROCE,

knowingly used and maintained a place, specifically 616 Walrath Street, Sparta, Wisconsin, for the purpose of distributing and using a controlled substance, specifically heroin, a Schedule 1 controlled substance.

(In violation of Title 21, United States Code, Section 856(a)(1)).

COUNT 7

Between in or about December 2012, to in or about April 2013, in the Western District of Wisconsin, the defendant,

MONTA GROCE,

knowingly used and carried a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, maintaining a place for the purpose of distributing and using a controlled substance, in violation of Title 21, United States Code, Section 856(a)(1), as alleged in Count 6 of this indictment, which is incorporated by reference.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT 8

In or about April 2014, in the Western District of Wisconsin, the defendant,

MONTA GROCE,

knowingly attempted to recruit, entice, harbor, transport, and maintain by any means "Jane Doe 1," in and affecting interstate commerce, knowing, and in reckless disregard of the fact, that force, threats of force, coercion, and any combination of such means, would be used to cause "Jane Doe 1" to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1).

(In violation of Title 18, United States Code, Sections 1594(a) and 1591(b)(1)).

COUNT 9

In or about April 2014, in the Western District of Wisconsin and elsewhere, the defendant,

MONTA GROCE,

knowingly engaged in conduct and thereby caused bodily injury to another person, specifically, defendant struck and assaulted "Jane Doe 1," and, in so doing, the defendant acted with intent to retaliate against "Jane Doe 1" because "Jane Doe 1" had provided information to law enforcement officers relating to the commission and possible commission of a federal offense.

(In violation of Title 18, United States Code, Section 1513(b)(2)).

A TRUE BILL

  
PRESIDING JUROR

  
JOHN W. VAUDREUIL  
United States Attorney

Indictment returned: 12/17/2015